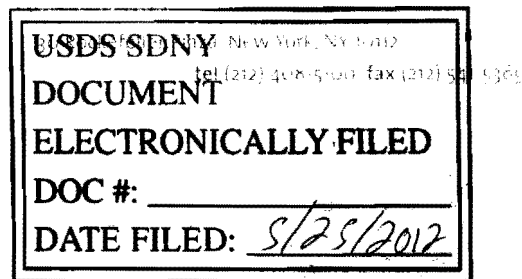
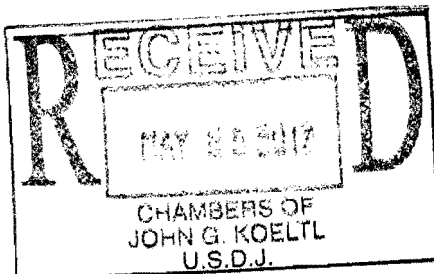


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May 25, 2012

BY HAND DELIVERY

Hon. John G. Koeltl, U.S.D.J.
United States Courthouse
500 Pearl Street
New York, New York 10007

*Briefing schedule approved.
Motion returnable before the
but I judge on July 3, 2012.
So ordered.*

Re: *In re Application Pursuant to 28 U.S.C. § 1782 of Okean B.V. and Logistic Solution
International to Take Discovery of Chadbourne & Parke LLP, Misc. No. 12-00104*

/u.S.D.5

5/25/12

Dear Judge Koeltl:

I am an attorney for my firm, Chadbourne & Parke LLP ("Chadbourne"), the respondent *pro se* here. Pursuant to instructions from the Part 1 Clerk's Office, I write Your Honor, as the Part 1 Judge, to (i) advise the Court that the parties have stipulated to a revised briefing schedule with respect to Chadbourne's Motion to Quash Subpoena; (ii) request that the Court hear oral argument on that motion; and (iii) provide the Court with a courtesy copy of our moving papers.

As originally noticed, Petitioners' opposition papers and Chadbourne's reply papers were due by May 22, 2012 and May 29, 2012, respectively. The parties have agreed to an extension of those deadlines through June 12, 2012 for opposition papers and through June 26, 2012 for reply papers.

Pursuant to Rule 2.E. of Your Honor's Rules, Chadbourne hereby respectfully requests oral argument on this motion. We submit that oral argument would assist the Court in adjudicating the legal and factual issues raised by the motion, which include whether 28 U.S.C. § 1782 permits Petitioners, the plaintiffs in litigation recently commenced in the Netherlands against certain clients of Chadbourne's Ukraine office, to conduct third-party discovery in the United States of documents located in Ukraine.

Enclosed is a courtesy copy set of our motion papers, consisting of two bound volumes, which include the following items:

- Notice of Motion;
- Memorandum of Law in Support of Respondent's Motion to Quash Subpoena;
- Declaration of Thomas J. Hall in Support of Respondent's Motion to Quash Subpoena dated May 8, 2012, and exhibits 1-2 thereto;



CHADBOURNE
& PARKE LLP

Hon. John G. Koeltl

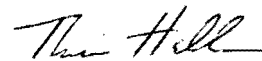
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May 25, 2012

- Declaration of Anna V. Putintseva in Support of Respondent's Motion to Quash Subpoena dated May 8, 2012; and
- Declaration of Joseph Conwell in Support of Respondent's Motion to Quash Subpoena dated May 8, 2012.

Once the motion is fully briefed, pursuant to Rule 2.B of Your Honor's Rules, we will submit courtesy copies of the opposition and reply papers.

Respectfully yours,



Thomas J. Hall

Enclosures

cc: Deborah A. Skakel, Esq. (by e-mail, without enclosures)
DICKSTEIN SHAPIRO LLP
Attorneys for Petitioners